

# Exhibit A

**David McCraw**

Date	Task	
2/28/2022	Review complaint and law on statute of limitations.	0.8
3/23/2022	Review notice of removal.	0.4
4/16/2022	Review first draft of brief for motion to dismiss and research on judicial notice.	1.2
4/19/2022	Review revised draft of brief.	0.5
4/21/2022	Phone conference with Jess Hui re: redaction of filings. Research on redaction in filings.	0.4
5/7/2022	Review response brief from Reade.	0.7
5/16/2022	Review draft of our reply.	0.9
6/24/2022	Prepare for and participate in moot argument for motion to dismiss.	1.7
	<b>Total</b>	<b>6.6</b>

**Dana Green**

Date	Task	
6/23/2022	Prepare for moot.	1.0
6/24/2022	Attend moot.	1.1
	<b>Total</b>	<b>2.1</b>

**Karen Chesley**

Date	Task	
2/28/2022	Review complaint and draft email to A. Sumar re analysis of same.	0.8
3/15/2022	Review MTD outline and add comments to same.	0.4
4/18/2022	Edit and provide comments on draft MTD.	1.1
5/6/2022	Review Reade opposition to MTD.	0.4
5/14/2022	Edit and provide comments on draft reply ISO MTD.	0.8
6/27/2022	Attend telephonic OA on MTD.	1.2
7/1/2022	Review decision on MTD and draft email to A. Sumar re same.	0.3
7/11/2022	Conf with A. Sumar and NYT team re [redacted].	0.2
	<b>Total</b>	<b>5.2</b>

**Al-Amyn Sumar**

Date	Task	
3/9/2022	Build outline of motion to dismiss/strike brief.	0.5
3/10/2022	Conduct legal research regarding statutory and common law claims; build outline for motion to dismiss/strike brief.	1.8
3/11/2022	Call with prospective local counsel; discussion with J. Hui re case strategy; legal research regarding negligence claim.	1.8
3/15/2022	Legal research regarding anti-SLAPP in federal court and public disclosure claim; continue building outline for MTD brief.	2.5
3/21/2022	Review and revise J. Hui's draft of notice of removal; review other requirements for removal papers.	2.3
3/22/2022	Review and revise J. Hui's draft notice to adverse party; continue revising notice of removal; review legislative history of 1798.85.	4.1
3/23/2022	Review and revise J. Hui's drafts of other removal filings.	0.5
3/24/2022	Confer with J. Hui regarding removal and legal research; review K. Corley's draft filings.	0.9
3/28/2022	Draft papers for extension of time motion; continue building outline of brief; additional legal research regarding [redacted].	3.7
3/31/2022	Begin drafting motion to dismiss/strike brief.	1.9
4/4/2022	Continue drafting motion to dismiss/strike brief.	5.6
4/5/2022	Continue drafting motion to dismiss/strike brief; additional research regarding negligence claim.	4.1
4/13/2022	Continue drafting motion to dismiss/strike brief.	2.2
4/14/2022	Continue drafting motion to dismiss/strike brief; draft request for judicial notice and declaration.	4.4
4/15/2022	Continue drafting motion to dismiss/strike brief; draft request for judicial notice and declaration.	4.8
4/18/2022	Revise brief and other filings in response to comments of D. McCraw and K. Chesley.	4.2
4/19/2022	Draft motion to seal; address comments of K. Corley; confer with K. Corley re same; conduct cite-check of brief.	5.4
5/6/2022	Review opposition brief; build outline of reply brief.	1.5
5/9/2022	Conduct legal research regarding anti-SLAPP statute and all claims.	3.0
5/10/2022	Begin drafting reply brief.	6.6
5/11/2022	Continue drafting reply brief.	4.2
5/12/2022	Additional revisions to reply brief, including in response to comments of J. Hui and K. Corley; make final revisions to reply brief; confer with K. Corley re filing.	5.1

	Hours	Rate	
David McCraw	6.6	650	4290
Dana Green	2.1	450	945
Karen Chesley	5.2	450	2340
Al-Amyn Sumar	98.8	400	39520
Jess Hui	31.9	300	9570
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6/22/2022	Prepare for oral argument.	2.2
6/23/2022	Prepare for oral argument; confer with K. Corley regarding same.	3.4
6/24/2022	Prepare for oral argument and attend moot with colleagues.	3.5
6/26/2022	Prepare for oral argument.	2.5
6/27/2022	Final preparations for oral argument and attend argument.	7.9
8/24/2022	Review motion for fees drafted by J. Hui.	0.2
8/30/2022	Begin revising motion for fees.	0.5
12/5/2022	Continue revising motion for fees.	1.5
12/8/2022	Continue revising motion for fees; revise declaration in support of fee motion.	2.2
12/9/2022	Continue and complete revised motion for fees; revise declaration in support of fee motion.	1.8
12/12/2022	Final review of and revisions to motion for fees and declaration.	2
	<b>Total</b>	<b>98.8</b>

**Jess Hui**

<b>Date</b>	<b>Task</b>	
3/8/2022	Research how "intent" is defined in other CA privacy statutes.	2.3
3/9/2022	Research whether SSN statutes around the country provide private causes of action.	3.9
3/9/2022	Research how "intent" is defined in other CA statutes.	2.1
3/11/2022	Call with prospective local counsel; discuss case strategy and research with A. Sumar.	1.8
3/11/2022	Research on merits of federal vs. state court, including anti-SLAPP applicability & fact/law distinction.	1.8
3/17/2022	Research on 1798.85.	3.1
3/21/2022	Draft removal papers; compile relevant exhibits.	1.1
3/24/2022	Meet with A. Sumar to discuss removal papers.	0.5
3/28/2022	Research on "offensive and objectionable element" for public disclosure claim and economic loss rule for negligence claim.	3.8
4/4/2022	Outline section on public disclosure of private facts; research judicial notice procedures.	0.5
4/6/2022	Draft public disclosure of private facts section.	1.7
4/18/2022	Edit MTD; research [redacted].	1.0
4/19/2022	Add pincites for WL citations.	0.4
4/21/2022	Draft request to seal; proof all other filings; call with DM (0.3).	3.6
5/16/2022	Edit reply brief.	1.1
6/24/2022	Prepare for and attend moot.	1.8
7/5/2022	Research on timing of fees application & fees on fees.	1.4
	<b>Total</b>	<b>31.9</b>